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Whole Foods Market Group, Inc., Mrs. Gooch's Natural
Food Markets, Inc., and WFM Southern Nevada, Inc.*

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

Lynn Marie Cousino, and all similarly
situated individuals,

Plaintiffs,

v.

Whole Foods Market, Inc.; Whole Foods
Market Group, Inc.; Mrs. Gooch's Natural
Food Markets, Inc.; and WFM Southern
Nevada, Inc.,

Defendants.

Case No. 2:17-CV-02531-JAD-PAL

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND DEADLINE TO
RESPOND TO FIRST AMENDED
COMPLAINT**

(First Request)

1 **STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINE TO RESPOND**
2 **TO FIRST AMENDED COMPLAINT (First Request)**

3 Pursuant to LR IA 6-1, LR IA 6-2, and LR 7-1, Defendants Whole Foods Market, Inc.,
4 Whole Foods Market Group, Inc., Mrs. Gooch's Natural Food Markets, Inc., and WFM Southern
5 Nevada, Inc. ("Defendants") and Plaintiff Lynn Marie Cousino ("Plaintiff"), by and through their
6 undersigned counsel of record, hereby stipulate and agree to a four-day extension of time for
7 Defendants to respond to Plaintiffs' First Amended Complaint in the above-captioned matter
8 until January 16, 2018.

9 On December 4, 2017, Plaintiff filed her First Amended Complaint for Damages
10 Pursuant to the Fair Credit Reporting Act, 15 U.S.C. § 1681, et seq. and for Relief Under the
11 Declaratory Judgment Act, 15 U.S.C. § 2201, and for Damages and Equitable Relief Under
12 Nevada Law (the "First Amended Complaint") (ECF No. 4). The current deadline for
13 Defendants' response to the First Amended Complaint is January 12, 2018. In light of
14 Defendants' counsels' concurrent, competing obligations and Defendants' recent engagement of
15 Nevada counsel, Greenberg Traurig, LLP, Defendants request a short extension of time in order
16 to finalize and submit their response to Plaintiff's First Amended Complaint. Plaintiff does not
17 object to the continuance and has agreed to the extension as a professional courtesy.

18 This is the first stipulation for an extension of time for Defendants to file and serve their
19 response to Plaintiff's First Amended Complaint.

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Based on the foregoing, the parties respectfully request that this Court enter an order extending the deadline for Defendants to file and serve their response to Plaintiffs' First Amended Complaint to **January 16, 2018**.

DATED this ___ day of January, 2018.

DATED this ___ day of January, 2018.

GREENBERG TRAURIG, LLP

KNEPPER & CLARK LLC

By: /s/ Christopher R. Miltenberger
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Counsel for Defendants

Counsel for Plaintiff

IT IS SO ORDERED:


**UNITED STATES
DISTRICT/MAGISTRATE JUDGE**

DATED: January 10, 2018